

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,
Plaintiffs,
v.
RUDOLPH W. GIULIANI,
Defendant.

No. 24-mc-00353-LJL

**DECLARATION OF
KENNETH A. CARUSO IN
OPPOSITION TO
PLAINTIFFS' MOTION AND
OBJECTION REGARDING
CLAIM OF EXEMPTION
[ECF 21-23]**

KENNETH A. CARUSO hereby declares, pursuant to 28 U.S.C. § 1746:

1. I am a member of the Bar of this Court and counsel for Defendant, Rudolph W. Giuliani ("Defendant"), in this case.
2. I make this Declaration in opposition to Plaintiffs' motion and objection, pursuant to CPLR §§ 5222-a(d) and 5240, regarding Defendant's claim of exemption from execution as to funds held at Parkside Financial Bank and Trust ("Parkside") [ECF 21-23].
3. Attached as Caruso Exhibit A is a document, entitled Entity Information, retrieved from a publicly-available database maintained by the New York Department of State.
4. Attached as Caruso Exhibit B is a copy of the Parkside statement for the month of May 2024.
5. Attached as Caruso Exhibit C is a copy of the Parkside statement for the month of July 2024.
6. Attached as Caruso Exhibit D is a payroll report for Giuliani Communications LLC.
7. Attached as Caruso Exhibit E is a copy of the Parkside statement for the month of June 2024.

8. Attached as Caruso Exhibit F is a copy of Defendant's Amended Exemption Claim Form regarding the account held at Parkside.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on October 1, 2024

/s/ Kenneth A. Caruso

Kenneth A. Caruso
Kenneth Caruso Law LLC
15 W. 72nd Street
New York, NY 10023
(646) 599-4790
ken.caruso@kennethcarusolaw.com

*Attorneys for Defendant,
Rudolph W. Giuliani*